### **BOARD OF GOVERNORS**

# Compliance & Quality Committee Meeting Meeting Minutes – April 18, 2024

L.A. Care Health Plan CR 1017-1018, 1055 W. Seventh Street, Los Angeles, CA 90017



Stephanie Booth, MD, Chairperson Al Ballesteros, MBA\* G. Michael Roybal, MD Fatima Vazquez

### Senior Management

Sameer Amin, MD, Chief Medical Officer Terry Brown, Chief of Human Resources Todd Gower, Chief Compliance Officer Augustavia J. Haydel, General Counsel Alex Li, Chief Health Equity Officer Noah Paley, Chief of Staff Acacia Reed, Chief Operations Officer

Edward Sheen, MD, Senior Quality, Population Health, and Informatics Executive

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\* Absent \*\* Via Teleconference

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
CALL TO ORDER	Chairperson Stephanie Booth, <i>MD</i> , called the L.A. Care Compliance & Quality Committee and the L.A. Care Health Plan Joint Powers Authority Compliance & Quality Committee meetings to order at 2:00 P.M.	
	She announced that members of the public may address the Committee on each matter listed on the agenda before the Committee's consideration of the item by submitting their comments via text, voicemail, or email.	
APPROVAL OF MEETING		Approved unanimously
AGENDA		3 AYES
	The meeting Agenda was approved as submitted.	(Booth, Roybal, and Vazquez)
PUBLIC COMMENT	There was no public comment.	

### **APPROVED**

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
APPROVAL OF MEETING MINUTES	Chairperson Booth had a question regarding Managed Care Accountability Set (MCAS) scores percentages. She asked if the the comparison is the same across the board or between other plans in other states that are for profit. Dr. Amin responded that Department of Health Care Services is not comparing apples to apples and it is one of the biggest arguments that L.A. Care makes when it comes to the MCAS scores. They switched to methodology that is not focused within the state. There are different Medicaid populations in every state and that makes it difficult to compare scores. When some instances L.A. Care compares highly compared to other states.  The March 21, 2024 meeting minutes were approved as submitted.	Approved unanimously.
CHAIRPERSON REPORT	There was no Chairperson's report.	
Education Topics		
COMPLIANCE & QUALITY COMMITTEE CHARTER PROCESS	Todd Gower, <i>Chief Compliance Officer</i> , discussed the Compliance & Quality Committee Charter Process. He stated that the changes are still be reviewed and it may be presented to the committee for approval at the May 16 meeting.	
CHIEF COMPLIANCE OFFICER REPORT	Mr. Todd Gower, Chief Compliance Officer, and the Compliance Department staff presented the Chief Compliance Officer Report (a copy of the full written report can be obtained from Board Services).  Miguel Varela Miranda, Senior Director, Regulatory Compliance, gave a Delegation Oversight update.  L.A. Care Delegation Oversight Manual  L.A. Care Health Plan ("LAC") contracts with certain healthcare providers ("Delegates") to perform certain administrative services and functions as part of their agreements with LAC, and performs regular oversight of the Delegates' performance to ensure adherence to regulatory, contractual, and operational requirements. Each year, on a regular and periodic basis, LAC requires Delegates to submit reports to substantiate its performance for each administrative service and function delegated. LAC's oversight activities include, but are not limited to, annual audits of the Delegate, as well review of monthly and quarterly reports submitted by the Delegate.  The oversight is intended to assess the Delegate's performance against benchmarks and thresholds, and validate regulatory and contractual compliance.  Decentralized Governance Model	

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
	PNM Oversight  Compliance Oversight	
	Credentialing Oversight	
	Pharmacy Oversight  Financial Compliance	
	Delegation Oversight at L.A. Care is structurally decentralized and managed by several departments within the organization: Compliance Department, Internal Audit, Business Units.	
	Provider Network Management	
	<ul><li>Quality Improvement</li><li>Financial Compliance</li></ul>	
	Pharmacy Compliance	
	Credentialing	
	What are the risks of a decentralized model?	
	• Lack of a holistic "delegate scorecard" that details status of the delegate's performance across the multiple delegated services.	
	<ul> <li>Instances of delegate non-compliance, tracking and trending, and overall monitoring efforts are not visible through the organization</li> </ul>	
	• There is no escalation path where concerns can be raised at different levels of management (lines of communication)	
	Documentation is not readily available since it is housed across multiple departments	
	Unclear roles and responsibilities between the business unit and compliance	

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
	Chairperson Booth asked Ms. Varela to explain to Member Vazquez what he means by "Decentralized." Mr. Varela responded that right now many different departments have Dleegation Oversight functionality, but there is no one nucleus to centralize that information.	
	<ul> <li>How do we bridge the gap?</li> <li>Develop a comprehensive model:         <ul> <li>Decentralized Model: Decentralization limits the visibility into the overall network. With network oversight responsibilities dispersed across various teams, coordinating activities and sharing information becomes challenging.</li> <li>Comprehensive Network Oversight: Centralized oversight helps ensure adherence to regulatory requirements and industry standards across the entire network environment. It facilitates consistent enforcement of compliance policies and simplifies audit processes.</li> </ul> </li> </ul>	
	Establish a formal delegation oversight program  PNM Oversight  Delegation Oversight Program  Quality Oversight	
	Pharmacy Oversight  What does the Delegation Oversight Program include?  • Roles & Responsibilities	

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
	<ul> <li>Sanctioning Framework</li> <li>Risk Stratification</li> <li>Escalation Path</li> <li>Key Delegation Oversight monitoring areas</li> <li>Delegate Scorecard</li> <li>Process Documents</li> <li>Delegation &amp; Contact Matrix</li> <li>SharePoint</li> </ul>	
	<ul> <li>Three-tiered Committee Structure</li> <li>Executive Delegation Oversight Committee: Serves as final level of escalation for any delegates with ongoing performance and/or compliance deficiencies that have not been remediated for extended periods of time. Responsible for reviewing the business case/justification and determining final sanctioning decisions</li> <li>Delegate Sanction Committee: Serves as the 1st level of escalation for any delegates with ongoing performance and/or compliance deficiencies. At-risk delegates are monitored closely ("on watch"). The committee will review the justification/business case for delegates proposed for sanctioning and research the impact of a sanction. Information is proposed to the Executive Delegation Oversight Committee for final determination</li> <li>Delegation Oversight Workgroup: The workgroup is comprised of stakeholders impacted or responsible for overseeing the delegates performance. The workgroup is responsible for collectively analyzing data/information pertaining to the delegates' regulatory performance/compliance, identifying performance deficiencies (risks/issues) and remediating performance concerns. If there is no progression in the delegate's performance, information is escalated to the Delegate Sanction Committee for further review and potential sanctioning, accompanied by a business case justifying the reasons for the proposed sanctioning</li> </ul>	
	Chairperson Booth asked how are they going to get the same level of information that L.A. Care will need to follow up on if they don't know if there are nine other correction action plans that are being worked on by other departments. Mr. Varela responded that they gather information on a monthly basis by coordinating with various business units to ensure compliance. The Compliance team serves as a central point for collecting and organizing this data to generate a scorecard. The ultimate goal is to collaborate with Mr. Paley's team to disseminate this information down to the	

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
	delegate level. This approach aims to facilitate discussions during joint action meetings by providing comprehensive insights into compliance matters and overall performance across different areas.	
	Member Roybal stated that he is more worried about entities tjat L.A. Care's delegates delegate to. He asked what L.A. Care is doing to monitor what its delegates are delegating. He noted that the state will ultimately see L.A. Care as responsible. Mr. Varela mentioned several initiatives supporting regulatory efforts. The new Department of Health Services (DHS) contract in 2020 mandates that contracts are reported to the regulatory body, granting visibility into contractual relationships beyond just care provision. Secondly, the organization is leveraging subject matter experts to delve into delegate activities, attending their committees and operational gatherings for deeper insights. This proactive approach acknowledges the changing regulatory landscape, emphasizing ongoing engagement with delegates rather than relying solely on annual audits.	
	Dr. Sheen gave the following Quality Improvement Update: Compliance Risk Summary - Open CAPs from 2022/2023 Audits NCQA Accreditation Survey UM7B denial letters missing language  Issue already corrected	
	<ul> <li>Half of files selected in survey were prior to LAC updates and improvements taking effect</li> <li>Accreditation conducted Mock Audit File Review of internal UM files and delegates         <ul> <li>18 / 24 UM and Delegate files reviewed met UM 7B requirements</li> </ul> </li> <li>Opportunities for Improvement:         <ul> <li>Non-Compliant Factors</li> <li>Factor 1: Reason for Denial</li> <li>Factor 2: Reference to Criterion</li> <li>Next Steps: QI will conduct continuous check-ins with UM and Delegates to ensure GAPs are remediated.</li> </ul> </li> </ul>	
	<ul> <li>NCQA Discretionary Survey</li> <li>DHS: UM13C</li> <li>Not enough denial files to review per 8/30 methodology; due to DHS E-Consult specialty referral process</li> <li>NCQA confirmed: "reviewing all available files is an acceptable methodology if the number of files falls short."</li> </ul>	
	Narrative explaining DHS E-Consult system, process improvement efforts, and auditing of all files was submitted as supporting evidence.	

AGENDA ITEM/ PRESENTER		MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
		tant (TMG) recommends proceeding with survey and not requesting extension; ce provided to date meets criteria.	
	2021 DMHC Routine S PASC-SEIU	·	
	• Inconsistency is MCLA	n QI policies and procedures being applied to PASC-SEIU product line	
		to implement reasonable procedures to investigate PQI in timely manner to improve process to address confirmed quality of care issues	
	Issues – PPG, Delegate	e, and Vendor	
	Team	Issue Summary	
	Accreditation	<b>NCQA</b> : Ongoing oversight of DHS eConsult process and generating enough files to review per NCQA survey methodologies	
	Accreditation	Access to Care: Plan Partners disagree with L.A. Care's minimum compliance rate of 80% set at 10% or higher than DMHC's goal of 70%. This benchmark has been set as a protective measure to set higher performance standards that directly correlates with member experience and network performance.  QI-030 Policy: Performance Goals  "QI will calculate performance goals annually for each Appointment Availability and After-Hours Access standard for all lines of business. The calculation will be determined by establishing a goal where L.A. Care achieves statistically significant improvement over the prior year's results. Exception: Goals will always be set to a minimum of 80%."	
	Initiatives	Blood Lead Screening - Initial Health Assessments: Rates have improved but still under 50 <sup>th</sup> percentile; not all providers are meeting this level or responding to attestation requirement. All IPAs have completed the attestation. In the process of requesting the Direct Network Providers to complete the attestation.	
	MY2022: Access & Av	ailability to Care	

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS							ACTION TAKEN
	Low Performing PPGs not mee Low Performing PPGs.  Quality MCAS Measures	ting Urg	ent Appoin	tment Meas	ure for Gast	roenterol	ogy (Medi-Cal)	
	Measure Description		MY2023 Admin Rate	MY2023 Hybrid Rate	Percentil	% below MPL	Denomin ator	
	Asthma Medication Ratio	Admin	64.91%	-	65.61	-0.70%	17,639	
	Follow-Up After Emergency Department Visit for Substance Use (FUA)	Admin	26.60%	-	36.64	-10.04%	13,348	
	Follow-Up After Emergency Department Visit for Mental Illness (FUM)	Admin	29.79%	-	54.87	-25.08%	11,297	
	Well-Child Visits in the First 30 Months of Life (W30A)	Admin	44.73%	-	58.38	-13.65%	14,660	
	Well-Child Visits in the First 30 Months of Life (W30B)	Admin	63.46%	-	66.76	-3.30%	33,034	
	Child and Adolescent Well- Care Visits (WCV)	Admin	45.30%	-	48.07	-2.77%	804,006	
	Cervical Cancer Screening (CCS)	Hybrid	-	53.55%	57.11	-3.56%	546,418	
	Childhood Immunization Status (CIS)	Hybrid		27.74%	30.9	-3.16%	32,916	
	Lead Screening in Children (LSC)	Hybrid		61.80%	62.79	-0.99%	33,062	

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
	Improvement Pillars (with selected new initiatives)	
	Increase Care Options  FIT and ATC Kils (flaunched 1271/2023)  Adding Mobile Media  Expanding direct mell campaigns  Strengthen collaboration and coordination across L.A. Care Departments: Pharmacy, Care Management and raining and addrasmangement and brain processes  Strengthen collaboration and coordination across L.A. Care Departments: Pharmacy, Care Management and raining Building encounter data management and training Building encounter data management encounters. Sharing best practices  Strengthen collaboration and coordination across L.A. Care Departments: Pharmacy, Care Managem Utilization Management, Appeals/Grievances, Customer Solution Center, Encounter Reporting and Adjustment, Analytics/IT, and Product: every member and provider interaction is opportunity  Member Roybal asked if L.A. Care is able to do automatic substitutions now that the state has over processing prescriptions. Dr. Sheen responded that there are no single solutions from the but L.A. Care is looking at PBMs to make sure that the right workflows are in place to provide right medication to patients. A number of the measures are not great measures, like medication adherence, there can be uninentended incentives. Many members are left with many refills and may not be the right medication for them and may not improve their outcomes. Dr. Amin strain this is delegated to the state's pharmacy vendor. L.A. Care tries to address this issue early communicating with the provider.	ment, Risk  as taken ne state, de the on nd it ated y by  noted oers.

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
	Richard Rice Jr., Director, Delegation Oversight Performance Monitoring and Account Management, Enterprise Performance Optimization, gave a Delegation Oversight Monitoring Clinical Monitoring update	
	Delegation Oversight Monitoring Clinical Compliance Monitoring	
	Clinical Compliance Monitoring	
	Qualitative Measures Quantitative Measures	
	Quarterly Reviews  Monthly Reviews	
	Denial Appropriateness  Letter (NOA) Contents  Timely Decision Making  Timely Notification to Members	

AGENDA ITEM/ PRESENTER			MOTIONS / MAJOR DI	ISCUSSIONS		ACTION TAKE
	Top	10 PPG	Monitoring So	cores and	CAPs	
	Top 10 Volume (Membe rship)	NAME	Q3	Q4	CAP Sent	
			Clinical Decision Making for S	ervice Authorization Request	Denials (95% Goal)	
			95.00%	92.0%	NA	
		Healthcare LA	Letter Content for Service	e Authorization Request Denia	ls (95% Goal)	
	•	(HCLA)	60.0%	52.0%	3/20/24	
			UM	Timeliness (95% Goal)		
			99.5%	99.6%	3/20/24	
			Clinical Decision Making for S	ervice Authorization Request	Denials (95% Goal)	
		D	100.0%	NA	NA	
	2	Department of Health Services	Letter Content for Service	e Authorization Request Denia	ls (95% Goal)	
	-	(DHS)	0.0%	NA	3/20/24	
				Timeliness (95% Goal)		
			91.7%	76.9%	3/20/24	
			Clinical Decision Making for S	· ·		
		Preferred IPA Of	81.3%	78.9%	03/20/24	
	3	California		e Authorization Request Denia	· · · · · · · · · · · · · · · · · · ·	
		(PIPA)	7.7%	0.0%	3/20/24	
				Timeliness (95% Goal)	2/00/04	
			93.2%	94.1%	3/20/24	
			Clinical Decision Making for \$ 94.4%	ervice Authorization Request 1	Deniais (95% Goal) NA	
		AltaMed Health		e Authorization Request Denia		
	4	Services	83,3%	e Authorization Request Denia 85.7%	3/20/24	
		(AMHS)		Timeliness (95% Goal)	J/ ZU/ Z <sup>4</sup>	
			99.1%	99.3%	3/20/24	

ENDA ITEM/ RESENTER		MOTION	NS / MAJOR DI	SCUSSIONS		ACTION 7
	Top 10	PPG Monitori	ng Scores	and CAPs		
	Top 10 Volume (Membership)	NAME	Q3	Q4	CAP Sent	
			Clinical Decision Mak	ing for Service Authorization Request I	Denials (95% Goal)	
			92.9%	88.2%	3/20/24	
	_	Allied Physicians	Letter Content fo	or Service Authorization Request Denia	ls (95% Goal)	
	5	(APIA)	0.0%	17.6%	3/20/24	
				UM Timeliness (95% Goal)		
			98.8%	97.1%	3/20/24	
			Clinical Decision Mak	ing for Service Authorization Request I		
			68.8%	87.5%	3/20/24	
		Community Family Care		or Service Authorization Request Denia		
	6	(CFC)	15.4%	43.8%	3/20/24	
		(6.6)	13.4%	UM Timeliness (95% Goal)	3/20/24	
			93.6%	93.8%	2/00/04	
					3/20/24	
				ing for Service Authorization Request I		
			93.3%	100.0%	NA	
	7	GLOBAL CARE IPA		or Service Authorization Request Denia	•	
	,	(GCMG - MEDPOINT MGMT)	76.9%	47.4%	3/20/24	
				UM Timeliness (95% Goal)		
			99.3%	99.3%	3/20/24	
			Clinical Decision Mak	ing for Service Authorization Request I	Denials (95% Goal)	
			100.0%	100.0%	NA	
	8	Optum/HealthCare Partners	Letter Content fo	or Service Authorization Request Denia	ls (95% Goal)	
	0	(HCPM)	0.0%	0.0%	3/20/24	
				UM Timeliness (95% Goal)		
			98.6%	99.9%	3/20/24	
	Top 10  Top 10 Volume (Membership)	PPG Monitori	ng Scores	and CAPs	CAP Sent	
	[Membership]					
				king for Service Authorization Request		
			71.4%	100.0%	3/20/24	
	9	Citrus Valley Physicians Group		or Service Authorization Request Denic		
		(CVPG)	14.3%	0.0%	3/20/24	
				UM Timeliness (95% Goal)		
			99.5%	96.2%	3/20/24	
			Clinical Decision Mal	king for Service Authorization Request	Denials (95% Goal)	
				1000	NA	
			85.7%	100%	INA	
	20	Prospect		100% or Service Authorization Request Denic		
	10	Prospect (PROH)				
	10		Letter Content for	or Service Authorization Request Denic	ls (95% Goal)	

Michael Sobetzko, *Senior Director*, *Risk Management and Operations Support*, gave a Risk Management and Operations Support update.

### **Risk Management Update**

Top Risks



Risk #	Risk Title	Risk Mitigation Plan Status	Comments
C2	HRA Assessment / Reassessment Timeliness	On Track	Management Action Plan received. MCLA HRA Operational Reports Pending-Go live 04/5/2024.
C13	Compliance Monitoring / Enforcement / Audits	On Track	Management Action Plan received. Programmatic changes to better enhance the compliance audit, monitoring and enforcement programs are currently in progress.
E5	Vendor Management / Contracting Process	Delayed	Management Action Plan not complete. Additional meetings to be held.
E10	Encounters	Delayed	Management Action Plan note complete. Additional meetings to be held.
O15	Delegation Oversight	On Track	Management Action Plan received. Programmatic changes related to Delegation Oversight are in progress.
O20	Staffing: Staffing / Skilled Hires / Time to Hire	Delayed	Management Action Plan not complete. Additional meetings to be held.
O23	DSNP Implementation and Oversight	On Track	Management Action Plan received. Programmatic changes related to DSNP Implementation and Oversight are in progress.

# Risk Management Update

Top Risks

Risk Mitigation Plan Status Key								
Off Track	Delayed	On Track	Validating	Mitigation In Place				

Risk # / Title	C2: HRA Assessment / Reassessment Timeliness						
Risk Statement	Where HRA assessments are not completed timely, potential enrollees who need extensive care management interventions will not receive care or interventions. Also, the untimely completion will expose LA to regulatory violations.						
Risk Owner(s)	Sameer Amin, Acacia Reed, Steven Chang						
Completed Risk Mitigation Activities	<ol> <li>Management Action Plan received March 2024</li> <li>CMC-Era Operational Reports and Ad-hoc Reports         <ul> <li>Compliance w/DSNP HRA requirements using manual workarounds are active and ongoing until automated reporting available.</li> </ul> </li> </ol>						
Open Remediation	<ol> <li>MCLA HRA Operational Reports: Scheduled to go live April 2024         <ul> <li>SPD 90 day</li> <li>MCLA Operational Monitoring</li> </ul> </li> <li>D-SNP HRA Monitoring Reports: Implemented D-SNP HRA monitoring report to capture new D-SNP LOB         <ul> <li>Completion Date: 8/11/23; Scheduled to go live April 2024</li> </ul> </li> </ol>						
Summary	Management Action Plans received and actively worked.						

AGENDA ITEM/ PRESENTER		MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
	that in the initial dialogue with do two years for so probably needs that it's not that approach. They longer be high, addressed, but r	ed that as Compliance gets into the reviews of correction action plans they know I state it can have multiple owners. They are making sure they are starting the epartment leaders. Chairperson Booth stated that as far as she can tell, it's at least ome of them, and when it says the management hasn't come up with a plan yet, it to be explained why that is. Mr. Gower agreed with Chairperson Booth and said they haven't come up with a plan it's more that they are trying to find the best are usualy working through it. The risks may stay on there, but the risk may no Sometimes they are waiting for technology or other things that needs to be mitigation work is being done.  **Inagement Update**    On	
	Risk # / Title	C13: Compliance Monitoring/Enforcement/Audits	
	Risk Statement	With the Plan winning new contracts and past CAP, the need to have strong monitoring and auditing is key. Not having a robust Compliance Program could put the new and current products at Risk.	
	Risk Owner(s)	Todd Gower, Miguel Varela, Richard Rice	
	Completed Risk Mitigation Activities	<ol> <li>Management Action Plan received March 2024</li> <li>Restructure of Regulatory Compliance (Vertical): Reorganize "EPO" into two distinct teams to clarify roles, provide focus and right sizing of team.</li> <li>Completion Date: March 8, 2024</li> </ol>	
	Open Remediation	<ol> <li>Quantification and Analysis: Each department leader will need to analyze their respective areas and assess the maturity level of the division. Analysis will need to encompass current state, GAP analysis, and future state proposals.</li> <li>Estimated Completion Date: April 2024</li> <li>Enhance Corporate Compliance Monitoring: Update processes to ensure appropriate oversight and monitoring. Develop new workflows. Hire and train staff to effectuate the updated processes.</li> <li>Estimated Completion Date: July 1, 2024</li> </ol>	
	Summary	Management Action Plans received and actively worked.	

#### AGENDA ITEM/ **MOTIONS / MAJOR DISCUSSIONS** ACTION TAKEN **PRESENTER** Risk Mitigation Plan Status Key Risk Management Update Delayed Validating Mitigation In Place Top Risks Risk # / Title E5: Vendor Management/Contracting Process Lack of cross functional third-party vendor management and oversight. How to ensure vendors **Risk Statement** adhere to contractual requirements. Complexed contracting process, multiple touches across organization, contracting may be delayed in certain parts of process. Centralized owner that works cross functionally with business partners. Risk Owner(s) Tom MacDougall, Afzal Shah, Augie Haydel Completed Risk No completed risk mitigation activities noted for this risk area. Mitigation **Activities** No open remediation items noted for this risk area. Open Remediation Management Action Plan not completed. Additional meetings are necessary. Summary Mr. Sobetzko gave an Issues Inventory update. Issues Inventory Update - Summary Feb-24 Mar-24 Apr-24 May-24 Jun-24 Nov-24 Dec-24 Aug-24 Sep-24 Reported 2 Open Closed to inventory Deferred Remediated Tracking Only Monitoring Only · Open - Issues confirmed by Compliance Risk Operations that require oversight and monitoring with business units. Closed to Inventory – Issues in which business units' are seeking guidance about a regulation or best practice process. **Deferred** – Issues in which regulatory guidance (DHCS, DMHC, or CMS) is pending to resolve or issue resolution is dependent on another business units' implementation of a system or process. Remediated – Issues that require formal or informal corrective action plans for resolution. Tracking Only - Issues managed by other Compliance areas ( such as Regulatory Affairs, Audits, Analysis, Communication and Internal Audit In which the risk management staff is following up for current status updates to closure. Monitoring Only - Issues in which corrective action plans are completed and monitoring is to be done by Compliance.

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCU		ACTION TAKEN						
		Mr. Sobetzko stated that he is happy to announce that there are only four issues that are open from prior to 2023. They are working through the clean up and have made good progress.							
	Issues Inventory Update – Open								
	Issue Name and Description	Date Reported	Business Unit	Status					
	Cancellation Letter Covered California  Investigating letters members received erroneously indicating disenrollment from L.A. Care with a cancellation date in 2024. (1551)	2/29/2024	Customer Solution Center (CSC) – Enrollment Services	Open					
	Plan Partners Timely Reporting of Annual Provider Network Reports (APNRs)  The Plan received notification from Plan Partners - Anthem Blue Cross and Blue Shield Promise that they are unable to meet the due date of 2/19/2024 to report Annual Provider Network Reports (APNR) data. (1549)	2/7/2024	Medi-Cal Products; Provider Data	Open					
	Call the Car State of Emergency February 2, 2024  The Plan received a communication from Call the Car (CTC) in regards to the State of Emergency declared due to weather/flooding. Call the Car is confirming services are being impacted and they will be conducting a comprehensive impact assessment once the state of emergency is lifted. (1548)	2/2/2024	Provider Network – Contract and Relationship Management	Open					
	Memorandum of Understanding (MOU) Implementation Requirements  Investigating L. A. Care's resources in place to manage MOUs for contracts, policies, oversight and monitoring based on the 2024 DHCS Medical APL 23-029. (1547)	2/1/2024	Product Teams	Open					

David Kagan, MD, Senior Medical Director, Direct Network, Utilization Management, gave a Utilization Management Update.

### **Authorization Request Timeliness Monitoring**

Timeliness of Authorization Decisions & Notifications	Q3 2023	Q4 2023	Jan 2024	Feb 2024
All LOB (95%)	99%	99%	99%	99%
Direct Network (MCLA subset: 95%)	98%	99%	99%	99%
DSNP (95%)	98%	96%	97%	98%

**Description of Data:** Overall timeliness for each LOB per quarter, all above goal of 95%

Relevance: Tight monitoring due to past enforcement action and CAPs in place for timeliness

 New metrics established by Compliance Department for Medicare D-SNP beginning August 2023.

#### **Maintenance Activities:**

- Leadership responsibility to monitor workflows and inventory daily, including holidays and weekends.
- Ongoing assessment of opportunities for process and system improvements, including those directly impacting reports and data.
- Assessing UM inventory and staffing, ensuring UM has the team required to process incoming requests.
- Implementation of Direct Network Prior Authorization (DNPA) electronic form on 3/1/24.
   Webinar hosted by PNM on 3/5/24 to introduce the DNPA form.

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
	Quality Assurance – Letters Identified Issues	
	January-February letter fallouts due to missing member address (letters resent on 2/21/24)	
	<ul> <li>Requested a system feature that enables reporting of reasons for failed letters – <u>SyntraNet</u> deployment scheduled for 3/28/24</li> </ul>	
	Letter fallouts resulting from voided member enrollment (members whose enrollment was not completed due to changes in eligibility)	
	<ul> <li>Inquiry sent to Compliance Department to determine requirements surrounding notifications for members with voided enrollment</li> </ul>	
	Chairperson Booth noted that L.A. Care has had challenges in translating letters, she asked if that is something that it reviews closely with its plan partners. Dr. Kagan stated that he is not able to comment on plan partners, because his team only looks at it internally. Dr. Amin stated that the translation was an issue very specific to a Syntranet problem occurring because of their internal issues. we have mitigated the issuehas been less of an issue.	
CHIEF MEDICAL OFFICER REPORT	Sameer Amin, MD, MPH, Chief Medical Officer, presented the April 2024 Chief Medical Officer report (a copy of the report can be obtained from Board Services).	
	Dr. Amin's report primarily focuses on the partnership between Health Services and Compliance to ensure better oversight of delegate performance. He praised Dr. Sheen and Dr. Kagan's efforts in utilization management, case management, and quality improvement, and noted the significant progress made for members. Dr. Amin stated that the Chief Medical Officer report will focus on compliance-related matters. He spoke about the new partnership with Compliance to address delegate performance, echoing concerns raised by Mr. Sobetzko and Mr. Varela regarding delegation oversight. The focus is on obtaining comprehensive information from provider groups and health plan partners to ensure better compliance and quality of care. The approach involves Health Services acting as subject matter experts for Compliance, assisting in reviewing incoming information and identifying performance issues. Dr. Amin stressed the importance of	

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN
	understanding not just Compliance but also the quality of performance, which requires a collaborative effort between Health Services and Compliance. He outlined a three-step plan: obtaining the right information, reviewing it with subject matter expertise, and taking action to improve performance. This includes meetings with provider groups and health plan partners to address concerns and improve performance. Dr. Amin also emphasized the need for requirements to flow through contracts and network teams to ensure consistent communication and action. He acknowledges that this process will take time to implement but is essential for enhancing oversight and improving member care.	
Provider Performance Improvement	Henock Solomon, Senior Manager, Incentives, Population Health, gave a report about (a copy of the report can be obtained from Board Services).	
(P4P/VIIP)	<ul> <li>Incentives serve as a motivator and amplifier for Quality Improvement (QI) interventions.</li> <li>The programs promote provider accountability and offer a business case for quality improvement.         <ul> <li>Performance measurement and reporting</li> <li>Peer-group benchmarking</li> <li>Value-based revenue (significant and meaningful <u>above capitation</u>)</li> <li>Designed to align the quality improvement goals of Plan Partners, Independent Physicians Associations (IPA), clinics and physicians.</li> <li>Aim to foster systematic process improvements and better care coordination</li> <li>Reduce variation and promote consistency</li> </ul> </li> </ul>	
	<ul> <li>Accomplishments &amp; Updates</li> <li>Measurement Year (MY) 2022 Medi-Cal P4P reports and payments <ul> <li>Around 900 Physician &amp; Clinics were paid out \$22 million.</li> <li>51 IPAs were paid out \$17.4 million for Medi-Cal VIIP.</li> </ul> </li> <li>MY 2022 L.A. Care Covered VIIP <ul> <li>24 IPAs were paid out \$2.4 million.</li> </ul> </li> <li>MY 2033 Cal MediConnect (CMC) VIIP <ul> <li>18 IPAs were paid out \$405,600.</li> </ul> </li> <li>MY 2022 Direct Network</li> <li>76 primary care providers and clinics were paid out \$447,000.</li> </ul>	

AGENDA ITEM/ PRESENTER		ACTION TAKE				
	P4P Perf  Physician Pay-f				S	
	Sol	os	MY 2020	MY 2021	MY 2022	
		Mean	28.05%	30.14%	27.01%	
	Performance Scores	Median	23.68%	27.14%	23.33%	
		Max	94%	98.33%	100%	
	Clin	ics	MY 2020	MY 2021	MY 2022	
		Mean	14.00%	26.74%	24.76%	
	Performance Scores	Median	22.73%	23.33%	23.58%	
			57.73%	68.89%	67.00%	

AGENDA ITEM/ PRESENTER		ACTION TAKEN				
	P4P Perf					
	<ul> <li>Value Initiative Program</li> </ul>					
	Medi	-Cal	MY 2020	MY 2021	MY 2022	
		Mean	32.41%	29.40%	25.47%	
	Performance	Median	30.27%	26.34%	22.95%	
	Scores	Max	81.61%	67.74%	62.45%	
	LAC	~c	MY 2020	MY 2021	MY 2022	
	LA					
	Performance	Mean	28.95%	28.96%	32.39%	
	Scores	Median	29.81%	27.23%	31.42%	
	565165	Max	48.16%	42.86%	45.00%	
	CIV	1C	MY 2020	MY 2021	MY 2022	
		Mean	37.80%	32.89%	29.17%	
	Performance	Median	35.86%	28.75%	27.77%	
	Scores	Max	62.64%	81.03%	56.80%	
	330.30	Max	62.64%	81.03%	56.80%	

AGENDA ITEM/		
PRESENTER	MOTIONS / MAJOR DISCUSSIONS	ACTION TAKEN

## Measure Specific Trends: Physician P4P

Threshold: 50th percentile among network

Threshold: 50th Percentile Among Network							
HEDIS Measure	MY2020	MY 2021	MY 2022	Rate Change (MY20 - MY22)			
Asthma Medication Ratio- 5-64 years of age	57.14%	62.68%	66.67%	9.53%			
Breast Cancer Screening	54.72%	51.43%	52.84%	-1.88%			
Cervical Cancer Screening	53.85%	52.57%	51.81%	-2.04%			
Childhood Immunization Status- Combo 10	15.50%	17.65%	18.92%	3.42%			
Chlamydia Screening in Women	62.70%	64.71%	65.81%	3.11%			
Controlling Blood Pressure	20.61%	24.04%	23.90%	3.29%			
Immunizations for Adolescents- Combo 2	32.79%	31.58%	33.33%	0.54%			
Prenatal & Postpartum Care- Postpartum Care	61.54%	63.16%	63.26%	1.72%			
Prenatal & Postpartum Care- Timeliness of Prenatal Care	77.97%	76.47%	73.33%	-4.64%			
Weight Assessment and Counseling for Child/Adol - Physical Activity	45.63%	56.20%	58.02%	12.39%			

# **Measure Specific Trends: Physician P4P**

**Benchmark**: 95<sup>th</sup> percentile among network

Benchmarks: 95th Percentile Among Network						
HEDIS Measure	MY 2020	MY 2021	MY 2022	Rate Change (MY20 - MY22)		
Asthma Medication Ratio- 5-64 years of age	90.50%	91.33%	93.79%	3.29%		
Breast Cancer Screening	79.17%	75.81%	75.00%	-4.17%		
Cervical Cancer Screening	72.98%	71.43%	70.21%	-2.77%		
Childhood Immunization Status- Combo 10	53.69%	56.84%	58.52%	4.83%		
Chlamydia Screening in Women	85.71%	86.69%	88.31%	2.60%		
Controlling Blood Pressure	68.09%	74.71%	71.95%	3.86%		
Immunizations for Adolescents- Combo 2	67.47%	64.48%	68.30%	0.83%		
Prenatal & Postpartum Care- Postpartum Care	84.15%	88.10%	83.33%	-0.82%		
Prenatal & Postpartum Care- Timeliness of Prenatal Care	92.45%	92.31%	88.89%	-3.56%		
Weight Assessment and Counseling for Child/Adol - Physical Activity	88.34%	91.81%	90.96%	2.62%		

Future Direction

External Benchmarking

• We will be transitioning from using L.A. Care provider peer group benchmarking to using external NCQA benchmarks for our MY 2024, RY 2025 P4P Programs.

New Program Launch

• Launched the SNF and Hospital P4P Programs in 2024.

Medicare Advantage Payout

AGENDA ITEM/ PRESENTER	MOTIONS / MAJOR DISCUSSIONS AC	CTION TAKEN			
	First year of payouts for our D-SNP level VIIP Program in late 2024.				
PUBLIC COMMENT ON CLOSED SESSION ITEMS	There was no public ccomment.				
ADJOURN TO CLOSED SESSION	Augustavia J. Haydel, Esq., <i>General Counsel</i> , announced the following items to be discussed in closed session. The JPA Compliance and Quality Committee meeting adjourned and the Compliance and Quality Committee adjourned to closed session at 3:35 P.M.				
	PEER REVIEW Welfare & Institutions Code Section 14087.38(o)				
	CONFERENCE WITH LEGAL COUNSEL—ANTICIPATED LITIGATION Significant exposure to litigation pursuant to Section 54956.9(d)(2) of Ralph M. Brown Act: Four potential cases				
	THREAT TO PUBLIC SERVICES OR FACILITIES Government Code Section 54957 Consultation with: Todd Gower, Chief Compliance Officer, Serge Herrera, Privacy Director, and Gene Magerr, Chief Information Security Officer				
	<ul> <li>CONFERENCE WITH LEGAL COUNSEL—EXISTING LITIGATION</li> <li>Pursuant to Section 54956.9(d)(1) of the Ralph M. Brown Act</li> <li>Department of Managed Health Care Enforcement Matter Numbers: 18-799, 20-063, 21-428, 21-509, 21-680</li> <li>Department of Health Care Services, Office of Administrative Hearings and Appeals, In the matter of: L.A. Care Health Care Plan Appeal No. MCP22-0322-559-MF</li> </ul>				
RECONVENE IN OPEN SESSION	The Committee reconvened in open session at 4:10 p.m. There was no report from closed session.				
ADJOURNMENT	The meeting adjourned at 4:10 p.m.				
Respectfully submitted by:	APPROVED BY:  Output  Description  Descripti				

Respectfully submitted by:

Victor Rodriguez, Board Specialist II, Board Services Malou Balones, Board Specialist III, Board Services Linda Merkens, Senior Manager, Board Services

Stephanie Booth, M. Stephanie Booth, M.D., Chairperson Date Signed:

5/18/2024 | 2:43 PM PDT